

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	Case No.10-27472JKF
Michael R. Lindsay	:	Chapter 13
Lorraine J. Lindsay	:	
Debtor(s)	:	Hearing Date:
	:	
Ronda J. Winnecour, Trustee	:	Related to Document#
	:	
Movant(s)	:	
	:	
vs.	:	
Michael R. Lindsay	:	
Lorraine J. Lindsay	:	
	:	
Respondent(s)	:	

TRUSTEE'S OBJECTION TO DEBTORS' AMENDED CLAIM OF EXEMPTIONS

Ronda J. Winnecour, Chapter 13 Trustee, represents the following:

1. The debtors filed the within proceedings under Chapter 13 on October 21, 2010.
2. Ronda J. Winnecour is the Chapter 13 Trustee in this case.
3. The Chapter 13 plan has not yet been confirmed by the Court.
4. On January 17, 2011 the debtors filed amended Schedules B and C.
5. The debtors' amended Schedule C sets forth a certain "Revocable Trust" the value of which is set forth as "unknown" and the exemption claimed in which is "0.00".
6. Given the trust is revocable, the Trustee suspects that the trust res may be available for liquidation alternative and in order for the trustee to determine the applicable liquidation alternative, she needs to know the actual monetary value of the asset.

WHEREFORE, the Trustee requests that the Court deny the debtors' claim of exemptions and direct the debtors to determine and disclose the actual monetary value of the Revocable Trust.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 02/04/11

by

/s/Mark A. Gregg
Mark A. Gregg- PA I.D. # 30727
Attorney for Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
412-471-5566

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CERTIFICATE OF SERVICE

I hereby certify that on the date shown below I served a true and correct copy of the foregoing document on the following, at the following address(es), by regular United States mail, postage prepaid:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
970 Liberty Center
1001 Liberty Ave
Pittsburgh PA 15222

Michael and Lorraine Lindsay
3711 Liberty Way
McKeesport PA 15133

Jason Mazzei, Esquire
432 Blvd of the Allies
Pittsburgh PA 15219

DATE: 02/04/11

Dianne DeFoor
Office of the Chapter 13 Trustee
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600 Grant Street
Pittsburgh, Pa. 15219
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